

## **CONFLICT OF INTEREST POLICY STATEMENT**

FORDHAM UNIVERSITY requires all employees *to avoid* any conflict between their interests and those of the University, and *to disclose* promptly any actual or potential conflicts.

The purpose of this policy is to ensure that the name, reputation, and integrity of the University are not compromised. The fundamental principle guiding its implementation is that no employee should have, or appear to have, any personal interests, relationships, or affiliations that conflict with the best interests of the University.

It is impossible to give an exhaustive list of situations that might present a conflict. However, among the most common situations that may constitute a conflict are:

- Holding an interest in or accepting free or discounted goods from any company or organization that does, or is seeking to do, business with the University, by any employee who is in a position to directly or indirectly influence either the University's decision to do business, or the terms upon which business would be done with such company or organization.
- Holding an interest in an organization that competes with the University.
- Being employed by (including working as a consultant) or serving on the board of any organization that does, or is seeking to do, business with the University or which competes with the University.
- Gaining personally, e.g., through commissions, loans, expense or travel reimbursements or other compensation, from any company or organization doing, or seeking to do, business with the University.

A conflict of interest may also exist when a member of an employee's immediate family is involved in situations described above.

Subject to any other applicable rules or regulations, this policy is not intended to prohibit the acceptance of modest courtesies, openly given and acknowledged as part of the usual business amenities, e.g., occasional business-related meals or promotional items of nominal or minor value not to exceed \$50 per occurrence (cumulative value for courtesies, meals, and/or items not to exceed \$250 in any twelve month period)

It is the responsibility of the employee to report promptly any actual or potential conflict that may exist between the employee (and employee's immediate family) and the University. In the absence of disclosure, violations of the principles and standards contained in this policy statement may be subject to discipline, up to and including employee discharge. *Employees with decision-making authority will be required to acknowledge receipt of this policy and when applicable, disclose any existing or potential conflicts.* The President of the University will have the final authority to determine the appropriate penalty for any policy violations.

10/8/08